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## Project XL An Alternative System for Regulating Hazardous Waste in Academic Laboratories

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## US EPA Project XL - *eXcellence and Leadership*

"XL is a national pilot program that tests innovative ways of achieving better and more cost effective public health and environmental protection. Through site specific agreements with project sponsors, EPA is gathering data to help the Agency redesign current approaches to public health and environmental protection."

## Project XL Criteria

- Superior Environmental Results
- Cost Savings & Paperwork Reduction
- Stakeholder Support
- Innovation/Multi-Media Pollution Prevention
- Transferability
- Feasibility
- Monitoring, Reporting & Evaluation
- Avoiding Shifting of Risk

## Laboratory Consortium for Environmental Excellence (LCEE)

- First meeting held Feb. 1996
- Incorporated as a non-profit in August 1997
- The LCEE is a solutions oriented group dedicated to identifying, developing, and sharing best environmental practices in labs.
- Members Include:
  - » Boston College
  - » Georgetown University
  - » Harvard University
  - » Northeastern University
  - » Trinity College
  - » Tufts University
  - » Univ Mass-Boston
  - » Univ Mass-Amherst
  - » University of Vermont

## Why Change is Needed

- Increasing regulations and enforcement
- High penalties for noncompliance
- Otherwise adequately regulated (ie. OSHA's Laboratory Standard)
- Labs unique culture, expertise and products
- Hazardous waste regulations were written for industry
- Overlapping jurisdictions - Federal, State, Local
- Enforcement variations overtime, inspector, region
- Organizational management in a University setting

## The Proposal

- Implement flexible, performance based standards for managing hazardous wastes in laboratories
  - » Environmental Management Plan (EMP)
- Move point of waste determination outside the laboratory
- Obtain EPA guidance on treatment in containers

## Current Status

- Final Project Agreement (FPA) being developed
- Categorical Exclusion or Modify Defn.
- Funding Sources
- Local Stakeholder Involvement
- Finalize EPIs
- EPA Developing Rulemaking for FR
- Enforceability Issues

## Stakeholders

- Locally
  - » Community Groups
  - » Faculty & Staff
  - » Fire Departments
  - » State Regulators
  - » Students
  - » Water Authorities
- Nationally
  - » Organizations
    - CHEMA
    - American Chemical Society
  - » Nat'l Academy of Sciences
  - » Ecologia
  - » Tellus Institute
  - » Howard Hughes Medical
  - » Commercial labs
    - Pfizer Inc.
  - » Many Universities
    - Colorado College, Cornell, MIT, Stanford, Univ. of CT, MN, WI, IL, many others
  - » Los Alamos Nat'l Lab

## The Future

- Sign the FPA this Fall
- Implementation, Monitoring & Reporting
- Four Year Pilot Study
- More schools may enter pilot program after 18 months
- Evaluation:
  - » Successful - EPA will enact - can be adopted by others
  - » Not Successful - pilot schools back to RCRA in labs

## Potential Problems

- States ultimately have the authority to accept or reject the new scheme
- Some hazardous waste managers feel the EMP is more stringent than existing regulations
- Implementation of EMP will require lab personnel buy-in to their responsibilities

## Important Advantages

- Falls in line with regulatory priorities (performance orientation, EMS approach)
- Consolidates OSHA and EPA requirements into a single plan
- Potentially useful for other environmental impacts (air emissions, emergency response)

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